

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
	:	Chapter 13
SHERI JOHNSON	:	
	:	Case No.
Debtor.	:	

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**MOTION OF DEBTOR TO APPROVE PARTIAL CLAIM**

SHERI JOHNSON (the “Debtor”), by and through their undersigned counsel, hereby submits this Motion to Approve Partial Claim with the U.S. Department of Homeland Security (“HUD”), serviced by Midland Mortgage (“Midland”), and in support thereof respectfully states the following:

1. The Debtor filed a voluntary petition for relief under chapter 13 of the bankruptcy code on October 8, 2021 (the “Petition Date”).
2. The Debtor owns real property located at 21 Goodrock Road Levittown, PA 19057 (the “Property”).
3. The Property is encumbered by a mortgage held by MidFirst Bank in the approximate amount of \$161,419.03 (the “First Mortgage”).
4. On or about June 26, 2023, HUD, by and through Midland, offered the Debtor a partial claim in the amount of \$9,744.68 (the “Partial Claim”).
5. The Partial Claim shall act as a subordinate, interest free loan to the First Mortgage, to be paid at either (a) the payoff or refinance of the First Mortgage; (b) sale of the Property; or (c) maturity of the First Mortgage.
6. The Partial Claim shall cure any post-petition mortgage arrears—if any—owed on the First Mortgage as of August 1, 2023.

7. The Partial Claim will not impose any undue burden on the Debtor, and will not prejudice the Debtor, the chapter 13 trustee, or any of the Debtor's creditors.

WHEREFORE, the Debtor respectfully requests this Honorable Court enter an Order approving the Partial Claim, and for such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

Dated: July 20, 2023

/s/ Brad J. Sadek

Brad J. Sadek, Esquire  
Sadek Law Offices  
Two Penn Center  
1500 JFK Boulevard, Suite 220  
Philadelphia, Pennsylvania 19102  
(215) 545-0008  
brad@sadeklaw.com

*Counsel to the Debtor*